

# Exhibit 1

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4 Civil Action No. 1:17-cv-02989-AT

5  
6 DONNA CURLING, et al.,

7 Plaintiffs,

8 vs.

9 BRAD RAFFENSPERGER, et al.,

10 Defendants.

11  
12  
13  
14  
15 REMOTE VIDEOTAPED DEPOSITION OF  
JAMES A. BARNES, JR.

16  
17 Lakeland, Georgia  
18 Wednesday, July 20, 2022  
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23  
24

25 Court Reporter: Michelle M. Boudreaux-Phillips, RPR

1           A     No. We always met in the conference room.

2           Q     In the conference room, not sitting in your  
3 office where your desktop was, right?

4           A     No.

5           Q     Okay. So when you would go to, like, polling  
6 sites, for example, or you'd have meetings with the  
7 Board in a conference room, you didn't have a laptop  
8 with you?

9           A     No.

10          Q     The laptop that you found for Ms. Hampton,  
11 can you just describe that in as much detail as you  
12 can, like what color was it, how big was it, what make  
13 or model was it?

14          A     It was just a gray laptop, maybe 17-inch  
15 screen.

16          Q     Do you remember the maker?

17          A     No.

18          Q     Did you power it on?

19          A     I did power it on just to see, but like I  
20 said, it didn't have any access to it. It didn't  
21 really seem relevant either because it was an older  
22 model, like I said. I don't think anybody had used it  
23 in a long time.

24          Q     When you powered it on, was there a log-in  
25 screen that came up?

1 A Yes.

2 Q Was it running Windows? Was it like --

3 A Yes.

4 Q -- a typical Window --

5 A Yeah.

6 Q Okay. The Outlook email that you used at  
7 Coffee County, was that -- did you click on an icon  
8 that opened an app, or did you log in to like a  
9 webpage?

10 A No, I clicked on an icon.

11 Q So this wasn't like a web-based email, this  
12 was something that -- it was an app that was locally on  
13 your computer?

14 A Yes, that's correct.

15 Q All right, pull up Exhibit Share if you  
16 would. I'm going to give you a document here. Let me  
17 just move it over.

18 All right, so if you click on -- are you in  
19 the folder for your deposition?

20 A Yes.

21 (Exhibit 1 marked for identification.)

22 Q (By Mr. Cross) Okay, if you refresh your  
23 screen, you should see a document pop up. It's going  
24 to be labeled Exhibit 1.

25 A Is it supposed to be under "Marked Exhibits"?